

ATTACHMENT G-2 DEFENDANTS' TRIAL EXHIBITS					
EXHIBIT #	BATES	DATE	DESCRIPTION	OBJECTION	RESPONSE
D001	N/A	6/21/2022	Plaintiff's Initial Disclosures		
D002	N/A	8/3/2022	Plaintiff's Responses to DE Red Roof Inn Inc.'s First Request for Production of Documents to Plaintiff		
D003, Interrogatory Nos. 2, 3, 14, 16	N/A	8/3/2022	Plaintiff's Responses to DE Red Roof Inn Inc.'s First Interrogatories to Plaintiff, H.B.		
D004, Interrogatory No. 14	N/A	10/25/2022	Plaintiff's Supplemental Responses to DE Red Roof Inns Inc.'s First Interrogatories to Plaintiff H.B.		
D005, Interrogatory Nos. 1-2	N/A	11/1/2022	Plaintiff's Supplemental Responses to DE Red Roof Inns Inc.'s First Interrogatories to Plaintiff H.B.		
D007	N/A	3/24/2022	Complaint for Damages		
D008	HBINSTAGRAM_0001-0078		Plaintiff H.B. Instagram	Authenticity, Relevance, Rule 404(b), Rule 403, Rule 412, Prejudice, Confusion	Relevant to issue in case, including damages as well as elements of Plaintiff's case.
D009	Plaintiff H.B. 000151 - 000153	1/19/2012	Gwinnett County PD Incident 2345		
D010	Plaintiff H.B. 000171	10/18/2013	State Court of Gwinnett County		
D011	Plaintiff H.B. 000172 - 000173	10/29/2013	State Court of Gwinnett County		
D012	Plaintiff H.B. 000174 - 000175	10/29/2013	State Court of Gwinnett County		
D013	Plaintiff H.B. 000176 - 000177	10/29/2013	State Court of Gwinnett County		

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D014	Plaintiff H.B. 000178 - 000179	11/18/2013	State Court of Gwinnett County		
D015	Plaintiff H.B. 000182 - 000183	7/8/2014	State Court of Gwinnett County		
D016	Plaintiff H.B. 000184 - 000185	7/10/2014	State Court of Gwinnett County		
D017	Plaintiff H.B. 000186 - 000187	7/11/2014	State Court of Gwinnett County		
D018	Plaintiff H.B. 000188	7/11/2014	State Court of Gwinnett Count		
D019	Plaintiff H.B. 000190 - 000191	9/23/2014	State Court of Gwinnett Count		
D020	Plaintiff H.B. 000192 - 000193	10/29/2014	State Court of Gwinnett County		
D021	Plaintiff H.B. 000194 - 000195	2/2/2015	State Court of Gwinnett County		
D022	Plaintiff H.B. 000372 - 000375	10/13/2018	State Court of Gwinnett County		
D025	Plaintiff H.B. 000769		Gwinnett Cty Police Incident Report (Galbraith 015)		
D030	Plaintiff H.B. 002573		State Court of Gwinnett County - Revocation Order re. Skii Dena Morris		
D031	Plaintiff H.B. 002586		Folio - Skii Morris		
D032	Plaintiff H.B. 002590		Folio - Teresa Fortune		
D033	Plaintiff H.B. 002598		State Court of Gwinnett County- Accusation re. Teresa Ann Fortune		
D034	Plaintiff H.B. 002601		Dekalb County State Court 16C92583 Confinement	Prejudice, Relevance, Rule 404(b), Rule 403	Relevant to issues in case, including damages

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D035	Plaintiff H.B. 002606 - 002609	3/8/2016	Dekalb County PD Incident Report- Re. Aggravated Battery & Armed Robbery	Prejudice, Relevance, Rule 404(b), Rule 403	Relevant to issues in case, including damages
D036	Plaintiff H.B. 002610 - 002612	8/6/2016	Dekalb County PD Incident Report- Re. Suspicious Person	Prejudice, Relevance, Rule 404(b), Rule 403	Relevant to issues in case, including damages
D044	Plaintiff H.B. 010338		Peachford Hospital Records		
D045	Plaintiff H.B. 010438		Emory Decatur Records	Relevance, Prejudice, Confusion, Rule 412, Rule 404(b), Rule 403	Relevant to issues in case, including damages and elements of Plaintiff's claims.
D049	Plaintiff H.B. 010927–010928	1/27/2023	Abigail Judge Ph.D. Retainer Agmt		
D051	RRI 000263 - 000305		Red Roof InnSider Employee Handbook		
D052	RRI_WK_00011505 – 00011527		Housekeeping Handbook,		
D053	HB_NDGA_Red_Roof_00000140 - 193		Red Roof Standards Manual,		
D054	HB_NDGA_Red_Roof_00000402 - 00000424		Safety and Security Presentation		
D055	RRI_WK_000028347-000028365		Safety and Security Presentation		
D056	HB_NDGA_Red_Roof_00000708 - 00001504		Manager in Training Manual		

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D057	RRI_WK_00011168 – 00011306HB_NDGA_Red_Roof_00000001 - 00000139		Operations Manual, Safety and Security December 2010		
D058	RRI_WK_00011789 - 00011817		Red Roof Inn General Manager Safety and Security Presentation		
D059	RRI 000137 – 000177		GSR Inn Sider		
D065 ¹	RRI 000923 - 000940	March 28, 2012	Red Roof Inn Weekly e-Pak	Relevance, Confusion re timing	Defendants reserve the right to utilize this exhibit should the Court rule on MILs that affect its admissibility.
D066	HB_NDGA_Red_Roof_140 - 193		Standards Manual		
D067	HB_NDGA_Red_Roof_194		Red Roof Inn #10166 - Norcross GA Site Specific Addendum		
D068	HB_NDGA_Red_Roof_195 - 214		March 22, 2001 Security Services Agreement with Wackenhut Security		
D069	HB_NDGA_Red_Roof_261-284		August 25, 2011 Addendum to Franchise Agreement		
D070	HB_NDGA_Red_Roof_285 - 328		August 25, 2011 Franchise Agreement		
D071	HB_NDGA_Red_Roof_329-353		FMW RRI III, LLC Limited Liability Company Agreement		

¹ While the Red Roof Defendants maintain that this, as well as many others on Plaintiff's exhibit list is irrelevant as to time, the Red Roof Defendants identify this exhibit as a contingent exhibit which is contingent on the Court's ruling on other exhibits. The Red Roof Defendants reserve the right to use this exhibit should it need to rebut evidence presented by other exhibits on Plaintiff's list.

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EXHIBIT #	BATES	DATE	DESCRIPTION	OBJECTION	RESPONSE
D073	HB_NDGA_Red_Roof_425-438		RRI West Management, LLC Limited Liability Agreement		
D074	HB_NDGA_Red_Roof_439-707		Lease Agreement between FMW RRI I, LLC and FMW RRI OPCO, LLC		
D075	HB_NDGA_Red_Roof_708-1504		Corporate MIT Manual	Relevance, Confusion re timing	Relevant because it includes information that was utilized during the relevant time period.
D076	HB_NDGA_Red_Roof_1505-1617		Management Agreement FMW RRI Opco, LLC and RRI West Management, LLC		
D077	HB_NDGA_Red_Roof_1619		2012 Performance Evaluation Nicole Carter	Relevance, Confusion re timing	Relevant because based on prior actions which included time frame at issue.
D078	HB_NDGA_Red_Roof_1621 - 1688		August 25, 2011 Franchise Agreement between Red Roof Franchising, LLC and FMW RRI Opco, LLC		
D079	HB_NDGA_Red_Roof_1689		RRI166 Atl Indian Trail Jan-12 TTM		
D080	HB_NDGA_Red_Roof_1690		RRI166 Atl Indian Trail Dec-12 TTM		
D081	HB_NDGA_Red_Roof_00001618		Kimberly Rachal MIT Evaluation		
D082	RRI_WK_00004866		NR 6 months 2012		
D085	Ex. 2 to Deposition of Glen Galbraith		Organization Chart		
D086	RRI_WK_00004867-RRI_WK_00004868		District 11 2012 Quality Results		

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D088 ²	RRI_WK_00048249-RRI_WK_00048251	February 6, 2012	Incident Report	Relevance, Confusion re timing	Defendants reserve the right to utilize this exhibit should the Court rule on MILs that affect its admissibility.
D089	RRI_WK_00011327; 11662; 11505-11527; 11602-11606; 11660; 11373-11413; 11588-11589		August 17, 2010 Email Correspondence	Relevance, Confusion re timing	Relevant to elements of Plaintiff's TVPRA claim.
D094	RRI_WK_00053510		October 20, 2008 Medallia Review		
D095	RRI_WK_00053511-RRI_WK_00053514		November 14, 2008 Email Correspondence		
D096	RRI_WK_00069571-RRI_WK_00069572		February 3, 2012 Incident Report		
D099	RRI_WK_00004870		District 11 2012 Analysis		
D101	RRI_WK_00004867 - 4868		District 11 2012 Quality Results YTD		
D102	RRI_WK_00004866		District 11 NR Report		
D104	RRI_WK_00000786		Case List for District 11		
D128			Videotaped interview with H.B. by Dr. Matthew Normal	Prejudicial, Confusing, Waste of Time, Cumulative, Misleading, Rule 403, Rule 412.	Relevant statements by Plaintiff to damages and elements of Plaintiff's TVPRA claim.
D129		2/24/2023	Personality Assessment Inventory Interpretive Report		

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EXHIBIT #	BATES	DATE	DESCRIPTION	OBJECTION	RESPONSE
D130		2/24/2023	PTSD Checklist for DSM-5 (PCL-5)		
D131		2/24/2023	Patient Health Questionnaire-9 (PHQ-9)		
D132		2/24/2023	Generalized Anxiety Disorder-7 (GAD-7)		
D133	Bristol Report		See Crime in the United States, Human Trafficking reports, individually for 2014, 2015, 2016, 2017, and 2018, written by FBI Criminal Justice Information Services Division special report.		
D134	HBTaged 0001-733		Business Records of Tagged owned by The Meet Group	Authenticity, Relevance, Rule 404(b), Rule 403, Rule 412, Prejudice, Confusion	Relevant to Plaintiff's elements of TVPRA and damages.
D135	RRI000762-871	6/2009	Assistant General Manager Development Guide		
D136	Bristol Report		DOJ Press Release, <i>GA Man Sentenced to 15 Years on Sex Trafficking & Mann Act Charges, 1/24/2008</i>		
D137	Bristol Report		DOJ Press Release, <i>GA Woman Sentenced to 140 Months in Prison for Human Trafficking, 10/13/2011</i>		
D138	Bristol Report		DOJ Press Release, <i>Key Member of Atlanta Human Trafficking Ring Pleads Guilty to Sex Trafficking Charges, 7/30/2009</i>		
D139	Bristol Report		DOJ Press Release, <i>Georgia Man Sentenced to 17 Years in Prison for Sex Trafficking of a Minor, 3/21/2012</i>		
D140	Bristol Report		FBI Press Release, <i>Atlanta Man Sentenced for Sex Trafficking of Minors, 8/3/2011</i>		
D141	Bristol Report		FBI Press Release, <i>Convicted Felon Sentenced for Sex Trafficking of a Minor, 12/5/2021</i>		
D142	Bristol Report		FBI Press Release, <i>Man Who Operated Sex Trafficking Ring Sentenced to Life in Federal Prison, 9/19/2012</i>		
D143	Bristol Report		DHS ICE Press Release, <i>GA man who attempted to buy child for sex sentenced to 10 years, 2/20/2014</i>		

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EXHIBIT #	BATES	DATE	DESCRIPTION	OBJECTION	RESPONSE
D144	Bristol Report		Georgia Public Safety Training Center Press Announcement, GPSTC Announces New Human Trafficking Online Course, 9/5/2018		
D145	HB_NDGA_Red_Roof_00000215 - 224	8/3/2010	Manager in Training Program Overview		
D146	Plaintiff's Deposition Exhibit D-3	8/25/2017	DeKalb County Police Department Incident Report		
D147	Plaintiff's Deposition Exhibit D-4	11/24/2019	Union City Police Department Incident Report		
D148	Plaintiff's Deposition Exhibit D-5	1/21/2021	DeKalb County Police Department Incident Report		
D149	Plaintiff's Deposition Exhibit D-6		Tagged Terms of Service		
D150	Plaintiff HB 011023 – 011029		Dr. Judge File Materials		
D151	Judge Deposition Exhibit 4		Statement of Account		
D152	Plaintiff HB 002570 - 002571		Stump Affidavit Exhibits		

Learned Treatises

Description	Objection	Response
How Local Police Can Combat the Global Problem of Human Trafficking: Collaboration, Training, Support for Victims, and Technology Are Keys to Success, Police Executive Research Forum (PERF) (2020), retrieved from: https://www.policeforum.org/assets/CombatHumanTrafficking.pdf		

Kimberly Mehlman-Orozco, Safe Harbor Policies for Juvenile Victims of Sex Trafficking: A Myopic View of Improvements in Practice, 3 Social Inclusion 52 (2015)		
Kimberly Mehlman-Orozco, Projected Heroes and Self-Perceived Manipulators: Understanding the Duplicitous Identities of Human Traffickers, 23 Trends in Organized Crime 95, 105-106 (2017)		
Mehlman-Orozco, Kimberly. (2017). Hidden in Plain Sight: America's Slaves of the New Millennium. Praeger		
OJJDP's EZAUCR		
Atlanta Journal-Constitution, CEO tied to child-sex trafficking, 11/9/2010, updated 1/25/2016		
Cook, Rhonda, "Human Trafficking Documented in Georgia." The Atlanta Journal Constitution, May 2, 2014.		
Georgia Public Safety Training Center Press Announcement, GPSTC Announces New Human Trafficking Online Course, 9/5/2018		
Kenneth J. Weiss, The Subject of Objectivity, Subjectively Considered, 49 J AM ACAD PSYCHIATRY LAW, 422–27 (2021)		
Gerald Young, PTSD in Court III: Malingering, assessment, and the law, 52 INT'L J.L. & PSYCHIATRY, 81-102 (2017)		

Adriel Boals and Lisa M. Hathaway, The importance of the DSM-IV E and Fcriteria in self-report assessments of PTSD, 24 J. ANXIETY DISORDERS, 161-66(2010)		
Chelsea N. Wooley and Richard Rogers, The Effectiveness of the Personality Assessment Inventory with Feigned PTSD: An Initial Investigation of Resnick's Model of Malingering, 22 SAGE, 449-58 (2015)		
James Knoll and Phillip J. Resnick, The Detection of Malingered Post-traumatic Stress Disorder, 29 PSYCHIATR CLIN N AM, 629-47 (2006)		
Shahid Ali, et al., Multimodal Approach to Identifying Malingered Posttraumatic Stress Disorder: A Review, 12 INNOV CLIN NEUROSCI., 12-20 (2015)		
Mikel Matto, et al., A Systematic Approach to the Detection of False PTSD, 47 J AM ACAD PSYCHIATRY LAW, 1-10 (2019)		
B. Christopher Frueh, et al., Apparent Symptom Overreporting in Combat Veterans Evaluated for PTSD, 20 CLINICAL PSYCHOLOGY REVIEW, 853–885 (2000)		
Paul R. Lees–Haley, MMPI-2 Base Rates for 492 Personal Injury Plaintiffs: Implications and Challenges for Forensic Assessment, 53 J CLIN PSYCHOL, 745-55 (1997)		

Steven Taylor, et al., Detection and management of malingering in people presenting for treatment of posttraumatic stress disorder: Methods, obstacles, and recommendations, 21 JOURNAL OF ANXIETY DISORDERS, 22-41 (2007)		
Richard Roger, et al., Explanatory Models of Malingering: A Prototypical Analysis, 18 LAW AND HUMAN BEHAVIOR, 543-52 (1994)		
American Psychological Association, Specialty Guidelines for Forensic Psychology, AMERICAN PSYCHOLOGIST (2013)		
Diagnostic And Statistical Manual Of Mental Disorders, Fifth Edition, TextRevision (DSM-5-TR)		
Posttraumatic Stress Disorder in the National Comorbidity Survey. Kessler, Ronald C. Ph.D. etc. Arch Gen Psychiatry. 1995;52:1048-1060.		
Psychiatric Dictionary Seventh Edition. Robert Jean Campbell, M.D. New York Oxford University Press. 1996		
Lifetime Prevalence and Age-of-Onset Distributions of DSM-IV Disorders in the National Comorbidity Survey Replication. Kessler, Ronald, C. Ph.D. etc. Arch Gen Psychiatry. 2005;62:593-602		
Sex Differences in Trauma and Posttraumatic Stress Disorder: A Quantative Review of 25 Years of Research. Tolin, David F. and Foa, Edna B. American Psychological Association Bulletin 2006;132(6) 959-992		

A Second Look at Prior Trauma and the Posttraumatic Stress Disorder Effects of the Subsequent Trauma A Prospective Epidemiological Study. Breslau, Naomi, Ph.D.; Peterson, Edward L., Ph.D.; Schultz, Lonni R., Ph.D. Arch Gen Psychiatry. 2008;65(4)431-437		
Heterogeneity in the Course of Posttraumatic Stress Disorder: Trajectories of Symptomatology. Dickstein, Benjamin D. and Suvak, Michael. etc. Journal of Traumatic Stress, 2010;23(3)331-339		
Faking Bad in Workers Compensation Psychological Assessments: Elevation Rates of Negative Distortion Scales on the Personality Assessment Inventory in an Australian Sample. Yoxall, Jacqueline, etc. Psychiatry, Psychology and Law, 2017; 24(5)682-693		
The Subject of Objectivity, Subjectively Considered. Weiss, Kenneth J. M.D. Journal of the American Academy of Psychiatry and the Law, 2021; 49 422-427		
Posttraumatic stress disorder in adults: Epidemiology, pathophysiology, clinical manifestations, course, assessment, and diagnosis. Sareen, Jitender, M.D. FRCPC. 2022		